

## Section 1. Registration Information

### Source Identification

Facility Name:	Eagle Point Facility
Parent Company #1 Name:	Energy Transfer Marketing & Terminals LP
Parent Company #2 Name:	

### Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Newly regulated substance above TQ in already covered process (40 CFR 68.190(b)(3))
Description:	
Receipt Date:	13-Aug-2018
Postmark Date:	13-Aug-2018
Next Due Date:	13-Aug-2023
Completeness Check Date:	27-Apr-2022
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

### Facility Identification

EPA Facility Identifier:	1000 0005 1775
Other EPA Systems Facility ID:	08093cstlgrtes1
Facility Registry System ID:	

### Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	64717981
Parent Company #1 DUNS:	64717981
Parent Company #2 DUNS:	64717981

### Facility Location Address

Street 1:	1240 Crown Point Road
Street 2:	
City:	Westville
State:	NEW JERSEY
ZIP:	08093
ZIP4:	1000
County:	GLOUCESTER

### Facility Latitude and Longitude

Latitude (decimal):	39.867201
Longitude (decimal):	-75.154938
Lat/Long Method:	Interpolation - Other
Lat/Long Description:	Plant Entrance (Personnel)
Horizontal Accuracy Measure:	3
Horizontal Reference Datum Name:	World Geodetic System of 1984

Source Map Scale Number:

## Owner or Operator

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Operator Name:	Energy Transfer Marketing & Term.
Operator Phone:	(856) 853-3101

## Mailing Address

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Operator Street 1:	1240 Crown Point Road
Operator Street 2:	
Operator City:	Westville
Operator State:	NEW JERSEY
Operator ZIP:	08093
Operator ZIP4:	1000
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:	Aaron Mierzwa
RMP Title of Person or Position:	Director, Eagle Point Operations
RMP E-mail Address:	Aaron.Mierzwa@energytransfer.com

## Emergency Contact

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Emergency Contact Name:	Aaron Mierzwa
Emergency Contact Title:	Director, Eagle Point Operations
Emergency Contact Phone:	(856) 853-3176
Emergency Contact 24-Hour Phone:	(609) 301-6064
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	aaron.mierzwa@energytransfer.com

## Other Points of Contact

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Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(856) 853-3101
Facility or Parent Company WWW Homepage Address:	<a href="http://energytransfer.com">http://energytransfer.com</a>

## Local Emergency Planning Committee

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LEPC:	West Deptford Twp LEPC
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## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:	50
FTE Claimed as CBI:	

## Covered By

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OSHA PSM :	Yes
EPCRA 302 :	Yes

CAA Title V:	Yes
Air Operating Permit ID:	56002

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency) Date:	18-Jul-2018
Last Safety Inspection Performed By an External Agency:	State environmental agency

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name:	Cocciardi and Associates, Inc.
Preparer Phone:	(717) 766-4500
Preparer Street 1:	4 Kacey Court
Preparer Street 2:	
Preparer City:	Mechanicsburg
Preparer State:	PENNSYLVANIA
Preparer ZIP:	17055
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

## Confidential Business Information (CBI)

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CBI Claimed:  
Substantiation Provided:  
Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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## Process Chemicals

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Process ID:	1000089345
Description:	Sphere Stor. and Blend.
Process Chemical ID:	1000111774
Program Level:	Program Level 3 process
Chemical Name:	Butane
CAS Number:	106-97-8
Quantity (lbs):	7700000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000089345
Description:	Sphere Stor. and Blend.
Process Chemical ID:	1000111776
Program Level:	Program Level 3 process
Chemical Name:	Pentane
CAS Number:	109-66-0
Quantity (lbs):	2800000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000089346
Description:	Pentane Blending System
Process Chemical ID:	1000111775
Program Level:	Program Level 3 process
Chemical Name:	Pentane
CAS Number:	109-66-0
Quantity (lbs):	320000
CBI Claimed:	
Flammable/Toxic:	Flammable

## Process NAICS

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Process ID:	1000089345
Process NAICS ID:	1000090567
Program Level:	Program Level 3 process
NAICS Code:	49311
NAICS Description:	General Warehousing and Storage

Process ID:	1000089346
Process NAICS ID:	1000090568
Program Level:	Program Level 3 process
NAICS Code:	49311
NAICS Description:	General Warehousing and Storage

## Section 2. Toxics: Worst Case

No records found.

## Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000052769

Model Used:

EPA's RMP\*Comp(TM)

Endpoint used:

1 PSI

Passive Mitigation Considered

Blast Walls:

Other Type:

## Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000049964

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Model Used:

EPA's RMP\*Comp(TM)

### Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

### Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Excess Flow Valve:

Other Type:



## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

The Sphere Storage and Blending Process includes 3 approximately 12,000 barrel butane storage spheres and 1 approximately 12,000 barrel pentane sphere. Butane and pentane are offloaded from 3 truck offloading stations, stored in the spheres, and blended into gasoline tanks. The system design meets or exceeds NFPA #58, NFPA #30, and API 2510.

### Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000094078
Chemical Name:	Butane
Flammable/Toxic:	Flammable
CAS Number:	106-97-8

Process ID:	1000089345
Description:	Sphere Stor. and Blend.
Prevention Program Level 3 ID:	1000075659
NAICS Code:	49311

Prevention Program Chemical ID:	1000094080
Chemical Name:	Pentane
Flammable/Toxic:	Flammable
CAS Number:	109-66-0

Process ID:	1000089345
Description:	Sphere Stor. and Blend.
Prevention Program Level 3 ID:	1000075659
NAICS Code:	49311

### Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	18-Jul-2018
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### Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	17-Apr-2018
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### The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

01-Aug-2018

## Major Hazards Identified

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Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

## Process Controls in Use

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Vents:	
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	Hydrocarbon detector (pump and sphere area), flow monitor along with temperature, pressure, and liquid level indicators

## Mitigation Systems in Use

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Sprinkler System:	
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	

Enclosure:  
Neutralization:  
None:  
Other Mitigation System in Use: Fire water monitors

## Monitoring/Detection Systems in Use

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Process Area Detectors: Yes  
Perimeter Monitors:  
None:  
Other Monitoring/Detection System in Use:

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:  
Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended:  
None: Yes  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 31-May-2018

## Training

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Training Revision Date (The date of the most recent review or revision of training programs): 31-May-2018

## The Type of Training Provided

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Classroom: Yes  
On the Job: Yes  
Other Training:

## The Type of Competency Testing Used

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Written Tests: Yes  
Oral Tests:  
Demonstration: Yes  
Observation: Yes  
Other Type of Competency Testing Used:

## Maintenance

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Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 31-May-2018

Equipment Inspection Date (The date of the most recent equipment inspection or test): 01-Jun-2018

Equipment Tested (Equipment most recently inspected or tested): System instrumentation

## Management of Change

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Change Management Date (The date of the most recent change that triggered management of change procedures): 17-Jul-2018

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 01-Jul-2017

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review): 31-May-2018

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit): 30-May-2018

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-Sep-2018

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)): 29-Apr-2012

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 31-May-2012

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 31-May-2018

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 08-May-2017

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 31-May-2018

Contractor Safety Performance Evaluation Date  
(The date of the most recent review or revision of  
contractor safety performance):

31-May-2018

### Confidential Business Information

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CBI Claimed:

## Description

Pentane Blending System consisting of one (1) 60,000 gallon vessel plus lines. Pentane is blended with refined product (gasoline) via line feeding a truck loading rack. Pentane is delivered via truck. The system design meets or exceeds NFPA #30 (Flammable Liquid).

## Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000094079
Chemical Name:	Pentane
Flammable/Toxic:	Flammable
CAS Number:	109-66-0
Process ID:	1000089346
Description:	Pentane Blending System
Prevention Program Level 3 ID:	1000075660
NAICS Code:	49311

## Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	31-May-2018
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## Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	20-May-2015
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## The Technique Used

What If:	
Checklist:	Yes
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-Sep-2015

## Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air: Yes  
Earthquake:  
Floods (Flood Plain):  
Tornado:  
Hurricanes:  
Other Major Hazard Identified:

## Process Controls in Use

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Vents:  
Relief Valves: Yes  
Check Valves: Yes  
Scrubbers:  
Flares:  
Manual Shutoffs: Yes  
Automatic Shutoffs: Yes  
Interlocks: Yes  
Alarms and Procedures: Yes  
Keyed Bypass: Yes  
Emergency Air Supply:  
Emergency Power: Yes  
Backup Pump:  
Grounding Equipment: Yes  
Inhibitor Addition:  
Rupture Disks:  
Excess Flow Device: Yes  
Quench System:  
Purge System:  
None:  
Other Process Control in Use:

## Mitigation Systems in Use

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Sprinkler System:  
Dikes: Yes  
Fire Walls:  
Blast Walls:  
Deluge System:  
Water Curtain:  
Enclosure:  
Neutralization:  
None:  
Other Mitigation System in Use: Fire water monitors

## Monitoring/Detection Systems in Use

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Process Area Detectors: Yes  
Perimeter Monitors:  
None:  
Other Monitoring/Detection System in Use: Hydrocarbon detector (pump and vessel area), flow monitor along with temperature, pressure, and liquid level indicators

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:  
Installation of Perimeter Monitoring Systems:  
Installation of Mitigation Systems:  
None Recommended:  
None: Yes  
Other Changes Since Last PHA or PHA Update:

## Review of Operating Procedures

---

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 31-May-2018

## Training

---

Training Revision Date (The date of the most recent review or revision of training programs): 31-May-2018

## The Type of Training Provided

---

Classroom: Yes  
On the Job: Yes  
Other Training:

## The Type of Competency Testing Used

---

Written Tests: Yes  
Oral Tests:  
Demonstration: Yes  
Observation: Yes  
Other Type of Competency Testing Used:

## Maintenance

---

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 31-May-2018

Equipment Inspection Date (The date of the most recent equipment inspection or test): 01-Apr-2018

Equipment Tested (Equipment most recently inspected or tested): Meter proving, etc.

## Management of Change

---

Change Management Date (The date of the most recent change that triggered management of change procedures): 09-Jul-2015

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 01-Jul-2017

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review): 01-Sep-2017

## Compliance Audits

---

Compliance Audit Date (The date of the most recent compliance audit): 30-May-2018

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-Sep-2018

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)): 16-Mar-2015

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 17-Mar-2015

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 31-May-2018

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 08-May-2017

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 31-May-2018

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 31-May-2018

## Confidential Business Information

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CBI Claimed:

## Section 8. Program Level 2

No records found.

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

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Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

### Emergency Response Review

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Review Date (Date of most recent review or update of facility's ER plan):

### Emergency Response Training

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Training Date (Date of most recent review or update of facility's employees):

### Local Agency

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Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): West Deptford Township LEPC

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (856) 845-2300

### Subject to

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OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify): NJAC7:31(1-6), 29CFR1910.119, 29CFR1910 Subpart L, 40 CFR Part 68

## Executive Summary

The Eagle Point NJ Facility includes Sunoco Partners Marketing & Terminals (SPMT) Eagle Point Tank Farm and Eagle Point Sales Terminal. The Eagle Point NJ Facility, hereafter referred to as the Facility, is a refined petroleum product storage and distribution facility in Westville, New Jersey. The Facility handles and stores various grades of unleaded gasoline, low-sulfur diesel, No. 2 fuel oil, butane, pentane, ethanol, and various petroleum based additives.

The Facility has fixed inventories of butane and pentane and operates two butane/pentane processes. In Process 1, butane is received by truck and stored in three (3) approximately 12,000 barrel spheres and pentane is received by truck and stored in one (1) approximately 12,000 barrel sphere. As needed, butane or pentane is injected into gasoline streams throughout the facility based on sampling results. In Process 2, pentane is received by truck and stored in one (1) approximately 60,000 gallon horizontal storage vessel and subsequently injected into regular and premium unleaded gasoline lines feeding the site gasoline truck loading rack. The Facility maintains a Facility Response Plan and coordinates emergency response with the local LEPC and responders at least annually.

Two requirements of this section specifically apply to operations at the Facility:

1. Purpose and General Duty Clause - The essence of the general duty clause is that an owner/operator that stores and uses hazardous chemicals in any quantity has a fundamental obligation to ensure a safe operation and to have plans in place in the event of an accident to appropriately manage the situation. SPMT is committed to the safe operation of the Facility to ensure a safe workplace for employees and a safe location for the Facility's neighbors. SPMT has procedures in place to prevent or mitigate the effects of accidents and is committed to emergency preparedness both within the Facility and community-wide. SPMT coordinates with the West Deptford Volunteer Fire Department and the West Deptford County LEPC at least annually and periodically reviews and retrain employees in the Emergency Action Plan.
2. Risk Management Plan - The primary function of the Facility is to act as a liquefied petroleum gas and flammable liquid storage and distribution facility. Due to the flammable effects associated with butane and pentane, it is necessary to observe certain safety precautions to prevent unnecessary human exposure, to reduce the threat to employee health, and to minimize the threat and impact to nearby members of the community. The Facility is strongly committed to employee, public, and environmental safety and health. Safety at the facility depends on the manner in which flammable substances are handled as well as the safety devices incorporated into the design of the processes. The Facility complies with the OSHA Process Safety Management Program for Highly Hazardous Chemicals (29 CFR 1910.119) and provides comprehensive training to employees and contractors that reinforces the safety policies and procedures of the facility. Programs are in place to help prevent any accidental releases and employees are trained for the appropriate emergency response in the event of a release.

For planning purposes, SPMT has considered the impact of worst case and alternative release scenarios. The probability of the worst case catastrophic event evaluated in this report is extremely remote. The worst case scenario is far less probable than natural catastrophes such as tornadoes and floods that could produce much more severe and extensive damage and injury. SPMT also considered the impact of a more likely loss of containment event. SPMT has implemented safety precautions and procedures designed to prevent and mitigate catastrophic releases. SPMT has active operating, maintenance, training and inspection procedures. SPMT provides annual emergency response training to its employees.

SPMT reports all significant accidents in accordance with 40 CFR 68.42 to the EPA. There have been no such accidents reported involving the covered processes at the Facility to date.

SPMT's management is committed to the following:

- Preventing accidents;
- Training employees in correct response procedures in the event of an accident;
- Participating in community emergency preparedness;
- Addressing any citizen concerns by fully explaining potential hazards associated with SPMT operations and all steps being taken to prevent and mitigate accidents; and
- Being a good corporate citizen in Gloucester County.

With these objectives in mind, the Risk Management Plan has been developed to provide information about our management of the risks associated with the flammable substance storage process. SPMT stresses its commitment to ensuring a safe working

environment for employees and visitors and intends to work cooperatively with the local responders and the community to ensure continued progress and improvement.